

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STEVE SCHMIDT,)	
)	
Plaintiff,)	Case No.: 19 cv 03865
)	
v.)	Honorable Sharon Johnson Coleman
)	
ZOLL MEDICAL CORPORATION,)	Magistrate Judge Susan E. Cox
)	
Defendant.)	
)	

JOINT STATUS REPORT

Pursuant to the Court's Third Amended General Order 20-0012, the Parties have conferred and jointly submit this Joint Status Report.

(a) Progress of Discovery.

The Parties have exchanged and responded to written discovery.

Prior to the onset of the COVID-19 pandemic, the Parties were preparing to commence oral discovery. Plaintiff's deposition, originally scheduled for March 3, 2020, had to be rescheduled due to Plaintiff's and his son's illness. Plaintiff's rescheduled deposition was then postponed due to the pandemic. At present, Plaintiff seeks to depose three individuals, one current ZOLL employee and two former ZOLL employees (one of whom lives out of state). Though the Parties had several conversations about scheduling these depositions prior to the pandemic, these depositions are currently unscheduled. The Parties both prefer that the depositions take place in-person rather than remotely, if possible.

Pursuant to the Court's Amended, Second Amended, and Third Amended General Order 20-0012, the fact discovery deadline currently is extended to July 27, 2020.

(b) Status of Briefing on Any Unresolved Motions.

There are no unresolved motions pending at this time.

(c) Settlement Efforts.

The Parties have not engaged in settlement discussions thus far. The Court previously ordered that after Plaintiff's deposition took place, Plaintiff was to make a settlement demand and Defendant was to respond within a certain time frame; these dates were then revised after the rescheduling of Plaintiff's deposition. *See* Dkt. 24 and Dkt. 28. The Parties propose that Plaintiff make a settlement demand within seven (7) days of the completion of Plaintiff's deposition and for Defendant to respond within fourteen (14) days of receipt of Plaintiff's demand.

(d) Agreed Proposed Schedule for the Next 45 Days.

Over the next 45 days, the Parties propose that they confer to determine new dates for the depositions of Plaintiff and the remaining fact witnesses and to begin such depositions, if possible.

(e) Agreed Proposed Revised Discovery and Dispositive Motion Schedule.

As set forth above, fact discovery is currently set to close July 27, 2020. The Parties request that the fact discovery deadline be extended by an additional 45 days, to September 10, 2020.

(f) Request Any Agreed Action that the Court Can Take Without a Hearing.

The Parties do not request any agreed action by the Court without a hearing, other than extending the fact discovery deadline as set forth above.

(g) Telephonic Hearing.

The Parties do not request a telephonic hearing at this time.

[SIGNATURES ON THE NEXT PAGE]

Dated: May 15, 2020

Respectfully submitted,

/s/ Jaclyn N. Diaz

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that, on May 15, 2020, she caused a copy of the foregoing *Joint Status Report* to be filed electronically with the Clerk of the Court using the Court's CM/ECF system, and notification of such filing was sent to the following:

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/s/ Orly Henry